

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ELSEVIER INC., BLACKWELL
PUBLISHING, LTD., WILEY
PERIODICALS, INC., WILEY-LISS,
INC., INFORMA UK LTD., INFORMA
USA, INC., AND AMERICAN
CHEMICAL SOCIETY,

Plaintiffs,

-against-

W.H.P.R., INC., RICHARD B.
HAYAT, RANDI HAYAT, EDUCO
PERIODICALS CO., INC., BARBARA
PESSINA, RUSSELL PESSINA,
PATRICIA ANSPACH, THOMAS ANSPACH,
KLAVDIYA A. LOKSHINA AND JOHN
DOE NOS. 1-50,

Defendants.
-----X

Judge McMahon

09 CIV 6512



09 Civ.

COMPLAINT

Plaintiffs Elsevier Inc. ("Elsevier"), Blackwell Publishing, Ltd., Wiley Periodicals, Inc., Wiley-Liss, Inc., Informa UK Ltd., Informa USA, Inc. (collectively "Informa"), and American Chemical Society ("ACS"), for their complaint against defendants, aver:

Nature of the Action

1. This case involves subscription fraud.

Plaintiffs publish many of the world's leading scientific, technical, and medical journals. Plaintiffs sell their journals

largely through subscriptions to two types of end users: (i) institutions which pay full rates, and (ii) individuals, who pay discounted rates. Plaintiffs are bringing this action because defendants have fraudulently purchased from plaintiffs individual subscriptions to dozens of plaintiffs' journals and resold them to institutions at higher rates breaching not only express contracts with plaintiffs, but also the anti-fraud code of conduct for their trade association. In doing so, defendants pocketed substantial profits at the expense of plaintiffs. Plaintiffs therefore seek to recover their damages resulting from defendants' violation of the Racketeer Influenced and Corrupt Organizations Act ("RICO"), common law fraud, breach of contract and conversion.

Jurisdiction and Venue

2. This Court has subject matter jurisdiction over the first and second claims in this action pursuant to 28 U.S.C. § 1331 because they arise under 18 U.S.C. § 1964(c) and (d), respectively. This Court has supplemental jurisdiction over the remaining claims in this action pursuant to 28 U.S.C. § 1367 because each is so related to the claims within the original jurisdiction of this Court that they form part of the same case or controversy within the meaning of Article III of the United States Constitution.

3. This Court has personal jurisdiction over the defendants because they reside, or transact business, in this State.

4. Venue is proper in this Court under 18 U.S.C. § 1965, and 28 U.S.C. § 1391(b).

Parties

5. Plaintiff Elsevier is a New York corporation having its principal place of business at 360 Park Avenue South, New York, New York. It publishes scholarly books and journals in many fields of natural and social science.

6. Plaintiff Blackwell Publishing, Ltd., Wiley Periodicals, Inc. and Wiley-Liss, Inc. (collectively "Wiley") are subsidiaries of John Wiley & Sons, Inc. Plaintiff Blackwell Publishing, Ltd. is a United Kingdom corporation having its principal place of business at 350 Main Street, Malden, Massachusetts. Plaintiffs Wiley Periodicals, Inc. and Wiley-Liss, Inc., are Delaware corporations having their principal place of business at 111 River Street, Hoboken, New Jersey. Wiley, together with other subsidiaries of John Wiley & Sons, Inc., publishes hundreds of scholarly journals in a variety of fields, including medicine, chemistry, physics, business, and certain social sciences.

7. Plaintiff Informa UK Ltd., a subsidiary of Informal PLC, is an English public limited liability company

having a place of business at Albert House 1-4 Singer Street, London, EC2A 4BQ, United Kingdom. Plaintiff Informa USA, Inc., a subsidiary of Informa PLC, is a Massachusetts corporation having a place of business at One Research Drive, Westboro, Massachusetts 01581. Informa, together with its affiliated companies throughout the world, publishes approximately twelve hundred scholarly journals worldwide in many fields. Informa does business under the trade name Taylor & Francis.

8. Plaintiff ACS is a federally chartered nonprofit organization having its principal place of business at 1155 Sixteenth Street, NW, Washington D.C. ACS is the principal organization in the United States for educators and professionals in the field of chemistry. ACS publishes more than thirty journals.

9. Defendant W.H.P.R., Inc. ("W.H.P.R.") is a corporation organized and existing under the laws of the State of New York with a place of business at 99 Sherwood Avenue, Farmingdale, New York. W.H.P.R. is, among other things, a subscription agent. As a subscription agent, it secures journal subscriptions from publishers on behalf of its clients.

10. Defendant Richard B. Hayat ("Hayat") is a natural person, a citizen of the State of New York, a resident of 40 Woodland Drive, Oyster Bay, New York, and the owner of W.H.P.R.

11. Defendant Randi Hayat is a natural person, a citizen of the State of New York, a resident of 40 Woodland Drive, Oyster Bay, New York, and the spouse of Hayat.

12. Defendant Educo Periodicals Company, Inc. ("Educo") is a corporation organized under the laws of the State of New York with its principal place of business at 632 Peekskill Hollow Road, Putnam Valley, New York.

13. Defendant Barbara Pessina is a natural person, a citizen of the State of New York, a resident of 632 Peekskill Hollow Road, Putnam Valley, New York, and a principal of Educo.

14. Defendant Russell Pessina is a natural person, a citizen of the State of New York, a resident of 632 Peekskill Hollow Road, Putnam Valley, New York, and the spouse of Barbara Pessina.

15. Defendant Patricia Anspach is a natural person, a citizen of the State of Indiana and a resident of 2367 East 100 North, Winamac, Indiana.

16. Defendant Thomas Anspach is a natural person, a citizen of the State of Indiana, a resident of 2367 East 100 North, Winamac, Indiana, and the spouse of Patricia Anspach.

17. Defendant Klavdiya A. Lokshina ("Lokshina") is a natural person, a citizen of the State of Indiana, and a resident of 87 Beecher Place, Newton Center, Massachusetts.

18. Defendants John Does Nos. 1-50 are associates of defendants.

The Business of Plaintiffs

19. Plaintiffs' journals consist primarily of peer-reviewed articles, written by one or more scholars, often based upon original research.

20. Plaintiffs invest heavily in publishing their journals. Plaintiffs incur substantial costs for copyediting, proofreading, typesetting, printing, binding, distributing and marketing, and maintaining their editorial offices.

21. Plaintiffs sell their journals almost entirely through annual subscriptions, on a calendar year basis. The price of those subscriptions varies depending upon the type of subscriber. Plaintiffs charge institutions full rates. Plaintiffs rely upon the income from these institutional subscriptions to make their journals economically feasible. The standard institutional subscription price reflects the fact that numerous people, over the course of time, will read the journals. Plaintiffs also offer subscriptions to individuals, at discounted rates, often as an accommodation to members of the scholarly societies that sponsor or own the journals that plaintiffs exclusively publish.

22. Plaintiffs are the sole source for their journals. Plaintiffs maintain a record of each institutional

and individual customer. This enables plaintiffs to provide customer support, pay royalties, and enhance their products for certain markets. Furthermore, plaintiffs offer subscribers discounted rates for items such as electronic access. Thus, even if plaintiffs were paid the full amount for subscriptions, the loss of customer information would irreparably harm plaintiffs.

23. Plaintiffs forbid any resale, or institutional use, of individual subscriptions. For example, Elsevier's invoices and purchase order forms generally state: "Customer/Client represents and warrants that it is purchasing Products and Services from Elsevier for its own account and use (or if the Client is an agent, for the account and use of no more than one principal) and not on behalf of any other person or entity except as may be expressly set forth otherwise in the Terms and Conditions." Blackwell Publishing Ltd. generally states in its pricing information that "Personal subscription rates are available for most of our journals. These rates are applicable to orders for bona fide personal use only, and remittance should be by personal cheque or credit card." The order form of Wiley Periodicals Inc. and Wiley-Liss, Inc. for print journal subscriptions states "Individual rate subscriptions may not be resold or used as library copies." Informa's electronic license agreement states that its explicit

written permission is required to use its material for "commercial use," which includes sale or resale. Upon joining ACS, a member must represent "I agree to restrict for my own personal use all publications to which I subscribe at member rates."

24. In addition to direct sales to individuals and institutions, each plaintiff sells subscriptions through subscription agents, such as W.H.P.R. Subscription agents, act as intermediaries between institutions, which are their customers, and the journal publishers, such as plaintiffs. Subscription agents can perform valuable services by removing from their customers the burden of extensive paperwork, while making payment and billing easier for publishers. Subscription agents understand the difference between individual and institutional subscriptions. Plaintiffs rely on the persons placing the subscription orders to identify truthfully the type of subscription they need, based on their status, as an individual or institution.

25. Plaintiffs provide agents with terms and conditions for orders on behalf of the library customers. These terms and conditions require that the agent identify the end user of each journal. For example, the standard contract between ACS and its agents provides "ACS will not fulfill orders submitted by the Subscription Agent, unless the foregoing

information is provided . . . b. For institutions: i. Full name of end user institution, ii. Address of institution, iii. Contact name at institution."

26. Defendant W.H.P.R. belongs to a trade association for subscription agents called the Association of Subscription Agents and Intermediaries ("ASA"). Recognizing the importance of providing accurate records to the publishers, that organization promulgated guidelines to "reduce the instances of the fraudulent supply of serials - especially the supply of subscriptions ordered from publishers at the personal rate and supplied to libraries at the institutional rate." These guidelines state, inter alia:

"Subscription Procedures

4. The Supplier must enter all subscriptions in the name of the Client to the Publishers (including scientific societies).

5. The Supplier must submit to the Client proof that subscriptions were implemented in the Clients name with the Publishers. This can be in the form of a copy pro-forma invoice or subscription code number. Any misuse of the client organization's name must be avoided.

6. Consolidation services should supply the Client's details to the publisher where required to enable access to the electronic component of any subscription.

Institutional Subscription & Personal Subscription

7. The Supplier will confirm to the Client that the subscription was ordered at the Publishers' 'Institutional Subscription Rate' and not at the

'Personal Subscription Rate'.

8. It is strictly forbidden to take out personal subscriptions on behalf of the Client organization at the Personal Subscription Rate. All subscriptions must be entered at the Institutional Subscription Rate."

27. Plaintiffs risk serious financial injury if they receive payment for institutional subscriptions at individual rates. A substantial decline in their income from journals could cause plaintiffs to stop publishing one or more journals, or to reduce the amount of information they publish in those journals. This would have an adverse impact on scholarship and, ultimately, scientific progress.

28. Plaintiffs take orders for subscriptions by mail, telephone, facsimile and the Internet.

The Unlawful Acts of Defendants

29. Defendants have engaged in a fraud, as well as a conspiracy to defraud, that involves purchasing individual subscriptions from plaintiffs at discounted rates and reselling those subscriptions to institutions at higher rates, reaping a substantial profit.

30. The leader of the fraud is Hayat. Pursuant to his scheme, Hayat has conspired with defendants Randi Hayat, Barbara Pessina, Russell Pessina, Patricia Anspach, Thomas Anspach, Lokshine and John Does Nos. 1-50 (the "Subscribing Defendants"). The Subscribing Defendants, as well as Hayat,

have subscribed to certain journals of the plaintiffs at individual rates, using the mail and interstate wires, and resold them to institutions at substantially higher rates. To conceal the fraudulent nature of their scheme, they have placed orders for individual subscriptions using false names and/or addresses. The Subscribing Defendants regularly stated their address as 99 Sherwood Avenue, Farmingdale, New York, the business address of W.H.P.R.

31. W.H.P.R. and Hayat are well aware of the unlawful nature of their conduct. In or before the Fall of 2005, John Wiley & Sons, Inc. asserted a claim against W.H.P.R. and Hayat for the same type of subscription fraud that is the subject of this action. W.H.P.R. and Hayat settled that claim, but have breached the settlement agreement.

32. Upon information and belief, Hayat has conspired to carry out, and cover up, the fraudulent scheme with Educo and Barbara Pessina.

33. As a result of defendants' fraud, plaintiffs have sustained damages, the precise amount to be determined by the trier of fact in this action.

A FIRST CLAIM FOR RELIEF
(RICO - 18 U.S.C. § 1963(c) Against
Hayat and the Subscribing Defendants)

34. Plaintiffs repeat paragraphs 1 to 33 with the same force and effect as if set forth in full.

35. W.H.P.R. is an "enterprise." In addition, the association in fact between and among Hayat and the Subscribing Defendants, for the purpose of securing journal subscriptions at individual rates and reselling them to institutions at higher rates, is an "enterprise."

36. Hayat and, upon information and belief, the Subscribing Defendants have conducted or participated in the conduct of the affairs of the enterprise, W.H.P.R. and/or the association in fact between Hayat and the Subscribing Defendants through a pattern of racketeering activity that consists of two or more predicate acts.

37. These predicate acts include acts of mail fraud, in violation of 18 U.S.C. § 1341, or wire fraud, in violation of 18 U.S.C. § 1343, in furtherance of their scheme of securing the following subscriptions, many using false names and addresses, to plaintiffs' journals at individual rates and reselling those subscriptions to institutions at higher rates. These predicate acts extended from as early as 2001 to 2008, and, given the annual nature of subscription renewals, threaten to continue into the future.

38. Hayat secured the following individual subscriptions to at least the following journals in his name intending to resell them to institutions at higher rates, and specifically intending to defraud the publisher.

<u>Publisher</u>	<u>Year</u>	<u>Journal</u>
Wiley	1998	Cancer
Wiley	1998	Cancer (including Cancer Cytopathology)
Wiley	1998	Cancer Cytopathology
Wiley	1999	The Journal of Comparative Neurology
Wiley	1999	Pediatric Blood & Cancer
Wiley	1999	American Journal of Hematology (single issue)
Wiley	1999	Cancer (including Cancer Cytopathology)
Wiley	2000	Pediatric Blood & Cancer
Wiley	2000	American Journal of Hematology
Wiley	2000	Neurourology and Urodynamics
Wiley	2001	Pediatric Blood & Cancer
Wiley	2001	American Journal of Hematology
ACS	2001	Biochemistry
ACS	2001	Journal of Physical Chemistry
ACS	2001	The Journal of the American Chemical Society
Elsevier	2002	Advances in Mathematics
Elsevier	2002	Biomedical Pharmacology
Elsevier	2002	Cell
Elsevier	2002	Current Biology
ACS	2002	Journal of Physical Chemistry
ACS	2002	The Journal of the American Chemical Society
Elsevier	2002	Neuron
Elsevier	2002	Journal of Mathematical Analysis and Applications
Wiley	2002	The Journal of Comparative Neurology
Wiley	2002	American Journal of Hematology
Wiley	2003	Journal of Surgical Oncology
Wiley	2003	Journal of Robotic Systems
Wiley	2003	Biotechnology & Bioengineering
Elsevier	2003	Advances in Mathematics
Elsevier	2003	Biomedical Pharmacology
Elsevier	2003	Cell
Elsevier	2003	Journal of Mathematical Analysis and Applications
Elsevier	2003	Neuron
Elsevier	2004	Advances in Mathematics
Elsevier	2004	Biomedical Pharmacology
Elsevier	2004	Cell
Elsevier	2004	Journal of Mathematical Analysis and Applications

Elsevier	2004	Neuron
Wiley	2004	Biotechnology & Bioengineering
Wiley	2004	International Journal of Quantum Chemistry
Wiley	2004	Journal of Medical Virology
Wiley	2005	Biotechnology & Bioengineering
Wiley	2005	The Journal of Comparative Neurology
Elsevier	2005	Cell
Elsevier	2005	Neuron
Elsevier	2005	Biomedical Pharmacology
Elsevier	2005	Gynecologic Oncology
Elsevier	2006	Gynecologic Oncology

39. Randi Hayat secured the following individual subscriptions to at least the following journals in her name intending to resell them to institutions at higher rates, and specifically intending to defraud the publisher.

Publisher Year Journal

Wiley	1998	Cancer
Wiley	1999	Pediatric Blood & Cancer
Wiley	1999	Cancer
Wiley	1999	Cancer (including Cancer Cytopathology)
Wiley	2000	Cancer (including Cancer Cytopathology)
Wiley	2001	Catheterization and Cardiovascular Interventions
Wiley	2001	Cancer (including Cancer Cytopathology)
ACS	2001	Journal of Physical Chemistry
ACS	2001	Journal of the American Chemical Society
Elsevier	2002	Cancer Cell
Elsevier	2002	Immunity
Elsevier	2002	Journal of Clinical Epidemiology
ACS	2002	Journal of Physical Chemistry
ACS	2002	Journal of the American Chemical Society
Elsevier	2002	Neuron
Wiley	2002	Catheterization and Cardiovascular Interventions
Wiley	2002	Cancer (including Cancer Cytopathology)
Wiley	2003	Catheterization and Cardiovascular Interventions
Wiley	2003	Cancer (including Cancer Cytopathology)

Wiley	2003	Genes, Chromosomes and Cancer
Elsevier	2003	Cell
Wiley	2004	Genes, Chromosomes and Cancer
Elsevier	2005	Cell
Elsevier	2005	Immunity

40. Pessina secured the following individual subscriptions to at least the following journals in her name intending to resell them to institutions at higher rates, and specifically intending to defraud the publisher.

Publisher Year Journal

Elsevier	2003	Journal of Biomechanics
Elsevier	2004	Journal of Biomechanics
Elsevier	2004	Journal of Biomechanics
Informa	2004	Electric Power Components & Systems
Informa	2005	Archives of Animal Nutrition

41. Russell Pessina secured the following individual subscriptions to at least the following journals in his name intending to resell them to institutions at higher rates, and specifically intending to defraud the publisher.

Publisher Year Journal

Informa	2005	Urban Studies
Informa	2005	International Journal of Geographic Information Science
Informa	2005	International Journal of Human Resource Management
Informa	2005	Journal of Environmental Planning and Management
Informa	2005	Regional Studies
Informa	2005	Urban Studies
ACS	2005	Inorganic Chemistry
ACS	2005	Journal of Organic Chemistry
ACS	2005	Organometallics
ACS	2005	Organic Letters
ACS	2005	JACS
ACS	2005	Inorganic Chemistry

ACS	2005	Journal of Organic Chemistry
ACS	2005	Organometalics
ACS	2005	Organic Letters
Informa	2005	International Journal of Geographic Information Science
Informa	2005	International Journal of Human Resource Management
Informa	2005	Journal of Environmental Planning and Management
Informa	2005	Regional Studies
ACS	2006	Accounts Chemical Research
ACS	2006	Analytical Chemistry
ACS	2006	Chemical Reviews
ACS	2006	Chemistry of Materials
ACS	2006	Accounts Chemical Research
ACS	2006	Analytical Chemistry
ACS	2006	Chemical Reviews
ACS	2006	Chemistry of Materials
ACS	2007	Accounts Chemical Research
ACS	2007	Analytical Chemistry
ACS	2007	Chemical Reviews
ACS	2007	Energy & Fuels
ACS	2007	Accounts Chemical Research
ACS	2007	Analytical Chemistry
ACS	2007	Chemical Reviews
ACS	2007	Energy & Fuels
ACS	2008	OPR&D
ACS	2008	Analytical Chemistry
ACS	2008	ES&T
ACS	2008	Energy & Fuels
ACS	2008	OPR&D
ACS	2008	Analytical Chemistry
ACS	2008	ES&T
ACS	2008	Energy & Fuels

42. Patricia Anspach secured the following individual subscriptions to at least the following journals in her name intending to resell them to institutions at higher rates, and specifically intending to defraud the publisher.

Publisher Year Journal

Informa	2005	Communications in Algebra
---------	------	---------------------------

Informa	2005	Communications in Statistics: Theory and Methods
Informa	2006	Journal of International Food & Agribusiness Marketing
Informa	2006	Journal of Sustainable Agriculture
Informa	2006	Reference Librarian
Informa	2006	Journal of Sustainable Agriculture
Informa	2006	Reference Librarian
Informa	2007	American Journal of Distance Education
Informa	2007	Developmental Neuropsychology
Informa	2007	Teaching and Learning in Medicine
Informa	2007	American Journal of Distance Education
Informa	2007	Developmental Neuropsychology
Informa	2007	Teaching and Learning in Medicine
Informa	2007	Creativity Research Journal
Informa	2007	Journal of Access Services
Informa	2008	Developmental Neuropsychology
Informa	2008	Reference Librarian
Elsevier	2008	Cell
Elsevier	2008	Molecular Cell
Elsevier	2009	Molecular Cell

43. Thomas Anspach secured the following individual subscriptions to at least the following journals in his name intending to resell them to institutions at higher rates, and specifically intending to defraud the publisher.

Publisher Year Journal

ACS	2005	Crystal Growth and Design
ACS	2005	Biochemistry
ACS	2005	The Journal of the American Chemical Society
ACS	2005	Journal of Medicinal Chemistry
ACS	2005	Crystal Growth and Design
ACS	2005	Biochemistry
ACS	2005	The Journal of the American Chemical Society
ACS	2005	Journal of Medicinal Chemistry

44. Lokshina secured the following individual subscriptions to at least the following journals in her name

intending to resell them to institutions at higher rates, and specifically intending to defraud the publisher.

Publisher Year Journal

Elsevier	2002	American Journal of Surgery
Elsevier	2002	Urology
Elsevier	2002	American Journal of Ophthalmology
Elsevier	2004	Orbis
Elsevier	2004	Telecommunications Policy
Elsevier	2004	Febs Letters
Elsevier	2005	Orbis
Elsevier	2005	European Management Journal
Elsevier	2005	Telecommunications Policy
Elsevier	2005	Trends in Biotechnology
Elsevier	2005	Febs Letters
Informa	2005	European Journal of the History of the Economic Thought
Informa	2005	International Trade Journal
Wiley	2005	Bell Labs Technical Journal
Wiley	2005	Journal of International Development
Informa	2005	Comparative Education
Informa	2006	International Journal of Control
Informa	2006	Journal of Economic Methodology
Elsevier	2006	European Management Journal
Elsevier	2006	Telecommunications Policy
Elsevier	2006	Trends in Biotechnology
Wiley	2006	Bell Labs Technical Journal
Informa	2006	Catalysis Reviews
Informa	2006	Comparative Education
Informa	2006	International Review of Sociology
Informa	2006	Higher Education in Europe
Informa	2006	Journal of Education Policy
Informa	2006	Journal of Higher Education Policy and Management
Informa	2007	Cryptologia
Informa	2007	Strategic Survey
Elsevier	2007	Telecommunications Policy
Wiley	2007	Economica
Wiley	2007	International Affairs
Wiley	2007	The Journal of Finance
Wiley	2007	Bell Labs Technical Journal
Informa	2007	Europe-Asia Studies
Informa	2007	Journal of Strategic Studies
Informa	2007	Public Library Quarterly
Informa	2007	Resource Sharing & Information Networks

Informa	2007 RUSI Journal & Whitehall Papers
Informa	2007 The Journal of Slavic Military Studies
Informa	2008 Cryptologia
Elsevier	2008 Brain and Language
Wiley	2008 Economica
Wiley	2008 International Affairs
Wiley	2008 The Journal of Finance
Wiley	2008 The World Economy
Wiley	2008 Bell Labs Technical Journal
Informa	2008 Bulletin of Spanish Studies
Informa	2008 Cultural Studies
Informa	2008 Japan Forum
Informa	2008 Europe-Asia Studies
Informa	2008 The Washington Quarterly

45. Upon information and belief, Hayat and/or the Subscribing Defendants secured the individual subscriptions identified on Schedule A in the (real or fictitious) name of a third-party intending to resell the subscriptions to institutions at higher prices.

46. Defendants secured each of the subscriptions described above with the intent to defraud a plaintiff into providing an institutional subscription at an individual rate.

47. The activities of each enterprise affect interstate or foreign commerce.

48. By reason of the violation of 18 U.S.C. § 1962(c), and specifically the predicate acts of mail fraud and wire fraud described above, plaintiffs have suffered a loss of subscription revenue that constitutes injury to their business or property.

49. Plaintiffs are entitled to recover three times the amount of the damage to their business or property.

A SECOND CLAIM FOR RELIEF
(RICO Conspiracy - 18 U.S.C. § 1962(d) Against All Defendants)

50. Plaintiffs repeat the paragraphs numbered 1 to 49 with the same force and effect as if set forth in full.

51. Hayat and the Subscribing Defendants, between themselves and among each other, have agreed to conduct or participate in the conduct of the affairs of W.H.P.R. and the association in fact among Hayat and the Subscribing Defendants through a pattern of racketeering activity. Upon information and belief, Hayat and the Subscribing Defendants each agreed to commit two or more predicate acts in furtherance of their scheme.

52. This pattern of racketeering activity consists of the predicate acts of mail fraud and wire fraud, described above, and the acts of wire fraud, described below, as part of the cover-up.

53. After a representative of plaintiffs, Mr. Andrew Pitts, questioned Hayat regarding the source of certain current journal subscriptions provided to a university, Hayat identified Educo as the source of the journals.

54. To further the cover-up of the scheme, Barbara Pessina on behalf of Educo wrote to Mr. Pitts by e-mail on July 3, 2008, stating:

"Richard Hayat at WHPR, Inc. has asked me to write to you to confirm that we have agreed to try to supply the following journals to him in 2008 against his reference SW UNIV:

Inorganic Chemistry
Journal of Organic Chemistry
Journal of ACS
Langmuir
Nano letters

Richard explained that you were concerned about where the material originated. We receive most of our material second hand from libraries, chemical and pharmaceutical companies and consignments, or we find it on line with the various backserv lists, etc. All of our material is gently used and comes from multiple sources. In other words, we may receive issues from a dozen or more different places in order to complete a journal year. When we can't find missing issues we first send out a Want List to the other backset companies or purchase the issues direct from ACS at the institutional rate." (Emphasis added.)

55. The statement of Pessina that Educo received its 2008 journals "second hand" from institutions was false, and intended to mislead plaintiffs.

56. By reason of the foregoing conspiracy in violation of 18 U.S.C. § 1962(d), plaintiffs have suffered a loss of subscription revenue that constitutes damage to their business or property.

57. Plaintiffs are entitled to recover three times the damage to their business or property.

A THIRD CLAIM FOR RELIEF
(Common Law Fraud Against Defendants)

58. Plaintiffs repeat the paragraphs numbered 1 to 57 with the same force and effect as if set forth in full.

59. Hayat and the Subscribing Defendants each purchased individual subscriptions from plaintiffs by representing that he or she intended to use those subscriptions for individual purposes, and/or by failing to disclose that he or she intended to resell those individual subscriptions to institutions, and/or by misrepresenting his or her name, address or other contact information.

60. These representations were false and misleading because defendants, at all material times, intended to resell the subscriptions to institutions, at a substantial profit.

61. Defendants made these misrepresentations and omissions intending to deceive plaintiffs.

62. The misrepresentations and omissions of the defendants were material to the decisions of plaintiffs to sell subscriptions to Hayat and the Subscribing Defendants. Plaintiffs relied upon the misrepresentations of the defendants in selling the individual subscriptions. Plaintiffs would not have sold individual subscriptions to Hayat and the Subscribing Defendants if plaintiffs had known that they intended to resell them to institutions.

63. Plaintiffs are entitled to recover punitive damages in an amount to be determined by the trier of fact in this action, plus interest and costs.

A FOURTH CLAIM FOR RELIEF
(Conspiracy to Defraud Against Defendants)

64. Plaintiffs repeat paragraphs 1 to 63 with the same force and effect as if set forth in full.

65. Hayat and the Subscribing Defendants conspired among themselves, and each other, to defraud plaintiffs by purchasing individual subscriptions to plaintiffs' journals and reselling them to institutions.

66. Hayat committed overt acts in furtherance of the conspiracy, including but not limited to selling to institutions the journals that he and the Subscribing Defendants purchased through individual subscriptions.

67. W.B.P.R. is vicariously liable for the acts of Hayat.

68. Barbara Pessina committed an overt act in furtherance of the conspiracy by making false statements to a representative of plaintiffs on July 3, 2008 to attempt to cover up the fraud.

69. Educo is vicariously liable for the acts of Barbara Pessina.

70. The Subscribing Defendants each committed an overt act in furtherance of the conspiracy by placing an order for an individual subscription to a journal and/or delivering, or causing to be delivered, to W.H.P.R. the journals resulting from those individual subscriptions.

71. As a result of the conspiracy to defraud between and among the defendants, plaintiffs have sustained damages in an amount to be determined by the trier of fact in this action, plus interest and costs.

A FIFTH CLAIM FOR RELIEF
(Breach of Contract Against Hayat
and the Subscribing Defendants)

72. Plaintiffs repeat paragraphs 1 to 71 with the same force and effect as if set forth in full.

73. Hayat and the Subscribing Defendants, by purchasing individual subscriptions, entered into contracts with plaintiffs. Those contracts prohibited Hayat and the Subscribing Defendants from reselling the journals obtained through an individual subscription to an institution at a higher rate.

74. By reselling the journals obtained through an individual subscription, Hayat and the Subscribing Defendants breached their contracts with plaintiffs.

75. As a result of those breaches of contract, plaintiffs have suffered damages, the precise amount to be determined by the trier of fact in this action.

A SIXTH CLAIM FOR RELIEF
(Breach of Contract Against W.H.P.R.)

76. Plaintiffs repeat paragraphs 1 to 75 as if set forth in full.

77. As part of its contracts with each plaintiff, W.H.P.R., as a subscription agent, had an obligation to fully and accurately disclose to plaintiffs the end user of each journal to which it procured a subscription.

78. W.H.P.R. breached its contract with each plaintiff by failing to fully and accurately disclose the end user of each journal to which it had procured a subscription.

79. As a result of those breaches of contract, plaintiffs received inaccurate and incomplete information concerning their customers. As a result, plaintiffs will suffer an injury for which monetary damages cannot compensate.

80. Plaintiffs are therefore entitled to a mandatory injunction compelling W.H.P.R. to specifically perform its obligations to fully and accurately disclose to plaintiffs the end user of each journal to which it has procured a subscription.

A SEVENTH CLAIM FOR RELIEF
(Conversion Against All Defendants)

81. Plaintiffs repeat paragraphs 1 to 80 as if set forth in full.

82. By obtaining possession of plaintiffs' journals fraudulently and unlawfully, defendants have converted the property of the plaintiffs.

83. As a result of such conversion, plaintiffs have suffered damages as alleged above and defendants have been unjustly enriched.

84. The conduct of defendants was knowing and malicious. As a result, plaintiffs are entitled to punitive damages in an amount to be determined at trial.

WHEREFORE, plaintiffs respectfully request that this Court enter judgment:

- A. Awarding plaintiffs compensatory damages in an amount to be determined at trial;
- B. Awarding plaintiffs treble damages pursuant to 18 U.S.C. § 1964;
- C. Awarding plaintiffs prejudgment interest;
- D. Awarding plaintiffs punitive damages;
- E. Awarding plaintiffs a mandatory injunction compelling defendant W.H.P.R. to fully and accurately disclose

the ultimate user of each journal to which it procured a subscription;

F. Awarding plaintiffs their reasonable attorneys' fees, costs of suit and interest; and

G. Awarding plaintiffs such other and further relief as the Court deems just and proper.

Dated: New York, New York
July 22, 2009

DUNNEGAN LLC

By 
William Dunnegan (WD9316)
wd@dunnegan.com
Laura Scileppi (0112)
ls@dunnegan.com
Attorneys for Plaintiffs
350 Fifth Avenue
New York, New York 10118
(212) 332-8300

Schedule A

Last Name	First Name	Plaintiff	Year	Journal
Accetta	B	Elsevier	2002	Journal of Macroeconomics
Accetta	B	Informa	2006	Review: Literature & Arts of the Americas
Accetta	B	Informa	2007	Critical Review
Acerenza	E	ACS	2001	Accounts of Chemical Research
Acerenza	E	ACS	2001	Biochemistry
Acerenza	E	ACS	2001	Journal of Agri and Food Chemistry
Acerenza	E	ACS	2001	Journal of Natural Products
Acerenza	E	ACS	2002	Accounts of Chemical Research
Acerenza	E	Elsevier	2002	American Journal of Medicine
Acerenza	E	Elsevier	2002	American Journal of Ophthalmology
Acerenza	E	Elsevier	2002	American Journal of Surgery
Acerenza	E	ACS	2002	Biochemistry
Acerenza	E	ACS	2002	Journal of Agri and Food Chemistry
Acerenza	E	ACS	2002	Journal of Natural Products
Acerenza	E	Elsevier	2002	Journal of Orthopaedic Research
Acerenza	E	Elsevier	2003	American Journal of Surgery
Acerenza	E	Elsevier	2006	Cell
Acerenza	E	Elsevier	2007	Cell
Acerenza	E	Elsevier	2008	Cell
Acerenza	E	Elsevier	2009	Cell
Acimovic	I	Informa	2006	Structural Equation Modeling: A Multidisciplinary Journal
Alcina	J	Elsevier	2006	Cell
Alcina	J	Elsevier	2007	Cell
Alcina	J	Elsevier	2008	Cell
Alcina	J	Elsevier	2009	Cell
Aldina	S	ACS	2002	Journal of Agri and Food Chemistry
Alflen	C	Elsevier	2002	Journal of Macroeconomics
Alflen	C	Informa	2006	Multivariate Behavioral Research
Ancona	L	ACS	2002	Macromolecules
Anwan	O	Elsevier	2002	Journal of Macroeconomics
Aparicio	R	ACS	2001	ES&T
Aparicio	R	ACS	2001	Journal of Agri and Food Chemistry
Ara	P	Elsevier	2002	American Journal of Cardiology
Ara	P	Elsevier	2002	American Journal of Ophthalmology
August	M	ACS	2001	Biochemistry
Auner	C	Elsevier	2002	Journal of Macroeconomics
Ayoub	A	ACS	2001	Biochemistry
Ayoub	A	ACS	2001	Journal of Medicinal Chemistry
Ayoub	A	ACS	2001	Journal of Organic Chemistry
Ayoub	A	Elsevier	2002	American Journal of Cardiology
Ayoub	A	Elsevier	2002	American Journal of Medicine
Ayoub	A	Elsevier	2002	American Journal of Surgery

Ayoub	A	ACS	2002	Biochemistry
Ayoub	A	ACS	2002	Journal of Medicinal Chemistry
Ayoub	A	ACS	2002	Journal of Organic Chemistry
Azir	M	Elsevier	2002	American Journal of Cardiology
Azir	M	Elsevier	2003	American Heart Journal
Azir	M	Elsevier	2004	American Heart Journal
Bernadone	Paul S.	Wiley	1999	American Journal of Industrial Medicine
Bernadone	Paul S.	Wiley	1999	American Journal of Medical Genetics
Bernadone	Paul S.	Wiley	1999	Journal of Medical Virology
Bernadone	Paul S.	Wiley	1999	Teratology
Bernadone	Paul S.	Wiley	2000	American Journal of Industrial Medicine
Bernadone	Paul S.	Wiley	2000	Journal of Robotic Systems
Bernadone	Paul S.	Wiley	2001	Journal of Robotic Systems
Bernadone	Paul S.	Wiley	2001	Teratology
Bernadone	Paul S.	Wiley	2002	Journal of Robotic Systems
Bernadone	Paul S.	Wiley	2002	Teratology
Bernadone	Paul S.	Wiley	2003	Journal of Computational Chemistry
Bernadone	Paul S.	Wiley	2003	Journal of Robotic Systems
Bernadone	Paul S.	Wiley	2004	Muscle and Nerve
Bernadone	Paul S.	Wiley	2005	Journal of Computational Chemistry
Bernadone	Paul S.	Wiley	2005	Muscle and Nerve
Bernardone	Paul	Elsevier	2002	Biochemical and Biophysical Research Communications
Bernardone	Paul	Elsevier	2002	Cell
Bernardone	Paul	Elsevier	2002	Cellular Immunology
Bernardone	Paul	Elsevier	2003	Clinical Immunology
Bernardone	Paul	Elsevier	2004	Clinical Immunology
Bernardone	Paul	Elsevier	2005	Clinical Immunology
Carmen	Robert	Elsevier	2007	Journal of Pediatrics
Carmen	Robert	Elsevier	2008	Journal of Pediatrics
Carnegie		Informa	2007	Journal of Latinos and Education
Castor	Michael	Informa	2006	Cognition and Instruction
Castor	Michael	Informa	2006	Journal of the Learning Sciences
Castor	Michael	Informa	2007	Journal of Educational and Psychological Consultation
Cordova	Evel	Elsevier	2002	Journal of Macroeconomics
Cordova	Evelyn	ACS	2001	ES&T
Cugliotta	Joeseeph	Wiley	2004	Glia
Cugliotta	Joeseeph	Wiley	2005	Microsurgery
Cugliotta	Joseph	Informa	2004	Drug Devel & Industr Pharmacy
Cugliotta	Joseph	Informa	2004	Drying Technology
Cugliotta	Joseph	Informa	2004	Substance Use & Misuse
Cugliotta	Joseph	Informa	2008	Drug Development and Industrial Pharmacy
Dean	A	ACS	2001	Journal of Natural Products

Delaine	H	Informa	2006	American Journal of Distance Education
Dempsey	A	ACS	2001	Analytical Chemistry
Dempsey	A	ACS	2002	Analytical Chemistry
Destephen	Anthony	Wiley	2003	Bioessays
Destephen	Anthony	Wiley	2003	Journal of Computational Chemistry
Destephen	Anthony	Wiley	2003	Journal of Medical Virology
Destephen	Anthony	Wiley	2003	Strategic Management Journal
Destephen	Anthony	Informa	2004	Assessment & Evaluation in Higher Education
Destephen	Anthony	Wiley	2004	Bioessays
Destephen	Anthony	Wiley	2004	Biometrical Journal
Destephen	Anthony	Wiley	2004	Birth Defects Research
Destephen	Anthony	Wiley	2004	Catheterization and Cardiovascular Interventions
Destephen	Anthony	Wiley	2004	Cell Motility & The Cytoskeleton
Destephen	Anthony	Wiley	2004	Chemical Engineering & Technology
Destephen	Anthony	Wiley	2004	Clinical Anatomy
Destephen	Anthony	Wiley	2004	Environmental and Molecular Mutagenesis
Destephen	Anthony	Wiley	2004	Human Brain Mapping
Destephen	Anthony	Wiley	2004	Microsurgery
Destephen	Anthony	Wiley	2004	Proteins: Structure, Function and Bioinformatics
Destephen	Anthony	Wiley	2004	Rapid Communications in Mass Spectrometry
Destephen	Anthony	Wiley	2004	Strategic Management Journal
Destephen	Anthony	Informa	2004	Xenobiotica
Destephen	Anthony	Informa	2005	Communications in Algebra
Destephen	Anthony	Informa	2005	International Journal of Remote Sensing
Destephen	Anthony	Informa	2006	International Journal Of Vegetable Science
Destephen	Anthony	Informa	2007	Drug Development and Industrial Pharmacy
Destephen	Anthony	Wiley	2007	Fems Microbiology Letters
Destephen	Anthony	Informa	2007	International Journal of Food Properties
Destephen	Anthony	Informa	2007	International Journal Of Vegetable Science
Destephen	Anthony	Informa	2007	Journal of Microencapsulation
Destephen	Anthony	Informa	2007	Journal of Wine Research
Destephen	Anthony	Informa	2008	Critical Reviews in Microbiology
Destephen	Anthony	Informa	2008	Drug Development and Industrial Pharmacy
Destephen	Anthony	Informa	2008	International Journal Of Vegetable Science (New Title)
Destephen	Anthony	Informa	2008	Journal Of Herbs, Spices & Medicinal Plants

Destephen	Anthony	Informa	2008	Journal of Microencapsulation
Destephen	Anthony	Informa	2008	Journal of Wine Research
Destephen	Anthony	Wiley	2008	Pharmacology Package
Destephen	Anthony	Wiley	2008	Philosophy and Phenomenological Research
Destephen	Anthony	Informa	2008	The Journal of Agricultural Education and Extension
Destephen	Anthony	Wiley	2008	The Philosophical Quarterly
Destephen	Anthony	Informa	2009	Ethics and Education
Destephen	Anthony	Informa	2009	International Journal Of Vegetable Science
Destephen	Anthony	Informa	2009	Journal Of Herbs, Spices & Medicinal Plants
Destephen	Anthony	Informa	2009	Journal of Moral Education
Destephen	Anthony	Informa	2009	Journal of Peace Education
Destephen	Anthony	Informa	2009	Reflective Practice
Destephen	Anthony	Informa	2009	The Journal of Agricultural Education and Extension
Devorach	M	Elsevier	2003	American Journal of Ophthalmology
Divak	B	ACS	2001	Journal of Agri and Food Chemistry
Divak	B	ACS	2002	Journal of Agri and Food Chemistry
Dizel	L	ACS	2001	Journal of Agri and Food Chemistry
Dizel	L	ACS	2002	Journal of Agri and Food Chemistry
Dlott	S	Elsevier	2002	Journal of Macroeconomics
Dolecki	S	ACS	2001	Journal of the American Chemical Society
Dolecki	S	ACS	2002	Journal of the American Chemical Society
Doust	L	ACS	2002	Journal of Agri and Food Chemistry
Duchesi	C	Elsevier	2002	American Journal of Medicine
Duchesi	C	Elsevier	2002	American Journal of Surgery
Duchesi	C	Elsevier	2003	American Journal of Medicine
Duchesi	C	Elsevier	2003	American Journal of Surgery
During	S	ACS	2001	Analytical Chemistry
During	S	ACS	2001	Journal of Agri and Food Chemistry
During	S	ACS	2002	Analytical Chemistry
During	S	ACS	2002	Journal of Agri and Food Chemistry
Durso	E	ACS	2001	Journal of Agri and Food Chemistry
Durso	E	ACS	2002	Journal of Agri and Food Chemistry
Dutchen	M	ACS	2001	ES&T
Dutchen	M	ACS	2002	ES&T
Duval	B	Elsevier	2002	American Journal of Infection Control
Dyson	C	ACS	2001	ES&T
Dyson	C	ACS	2001	Journal of Agri and Food Chemistry
Dyson	C	ACS	2002	ES&T
Dyson	C	ACS	2002	Journal of Agri and Food Chemistry
Eakins	R	ACS	2002	Analytical Chemistry
Eakins	R	ACS	2002	Organometallics

Easterbrook	S	ACS	2001	Analytical Chemistry
Easterbrook	S	ACS	2001	Journal of Organic Chemistry
Easterbrook	S	ACS	2002	Analytical Chemistry
Easterbrook	S	ACS	2002	Journal of Organic Chemistry
Eastlund	L	ACS	2002	I&EC Research
Eastlund	L	ACS	2002	Inorganic Chemistry
Eastlund	L	ACS	2002	Journal of Medicinal Chemistry
Eastlund	L	ACS	2002	Journal of Organic Chemistry
Eastlund	L	ACS	2002	Journal of Physical Chemistry
Ebenezer	J	ACS	2002	Inorganic Chemistry
Ebenezer	J	ACS	2002	Journal of Organic Chemistry
Ebenezer	J	ACS	2002	Journal of Physical Chemistry
Ebenezer	J	ACS	2002	Journal of the American Chemical Society
Ebenezer	J	ACS	2002	Organometallics
Ebersole	A	ACS	2002	Analytical Chemistry
Ebersole	A	ACS	2002	Chemical Reviews
Eckmann	R	ACS	2002	Energy and Fuels
Eckmann	R	ACS	2002	I&EC Research
Ehmer	R	ACS	2001	Analytical Chemistry
Ehmer	R	ACS	2001	Journal of Chem and Eng Data
Ehmer	R	ACS	2001	Journal of Organic Chemistry
Ehmer	R	ACS	2001	Journal of Physical Chemistry
Ehmer	R	ACS	2001	Journal of the American Chemical Society
Ehmer	R	ACS	2001	Organometallics
Ehmer	R	ACS	2002	Analytical Chemistry
Ehmer	R	ACS	2002	Chemical Reviews
Ehmer	R	ACS	2002	Journal of Chem and Eng Data
Ehmer	R	ACS	2002	Journal of Organic Chemistry
Ehmer	R	ACS	2002	Journal of Physical Chemistry
Ehmer	R	ACS	2002	Journal of the American Chemical Society
Ehmer	R	ACS	2002	Organometallics
Eichorn	D	ACS	2002	Journal of Organic Chemistry
Einbinder	J	ACS	2001	Biochemistry
Eisenberg	S	ACS	2002	Analytical Chemistry
Eisenberg	S	ACS	2002	Chemical Reviews
Eisenberg	S	ACS	2002	Inorganic Chemistry
Eisenberg	S	ACS	2002	Journal of Organic Chemistry
Eisenberg	S	ACS	2002	Journal of Physical Chemistry
Eisenberg	S	ACS	2002	Journal of the American Chemical Society
Ekberg	K	ACS	2001	Inorganic Chemistry
Ekberg	K	ACS	2001	Journal of Physical Chemistry
Elefante	V	ACS	2001	Analytical Chemistry
Elite	R	ACS	2001	Analytical Chemistry
Elite	R	ACS	2001	Journal of Organic Chemistry
Erdman	M	Elsevier	2002	Journal of Macroeconomics

Erkel	J	ACS	2001	Chemistry of Materials
Erkel	J	ACS	2001	Journal of Physical Chemistry
Erkel	J	ACS	2002	Chemistry of Materials
Erkel	J	ACS	2002	Journal of Physical Chemistry
Erkel	J	ACS	2002	Journal of the American Chemical Society
Estevez	D	ACS	2001	Inorganic Chemistry
Estevez	D	ACS	2001	Journal of Organic Chemistry
Estevez	D	ACS	2001	Organometallics
Estevez	D	ACS	2002	Analytical Chemistry
Estevez	D	ACS	2002	Chemical Reviews
Estevez	D	ACS	2002	Inorganic Chemistry
Estevez	D	ACS	2002	Journal of Organic Chemistry
Estevez	D	ACS	2002	Journal of the American Chemical Society
Etheridge	K	ACS	2002	Inorganic Chemistry
Etzel	E	ACS	2001	ES&T
Etzel	E	ACS	2001	Journal of Organic Chemistry
Eugene	E	Elsevier	2002	American Journal of Medicine
Eugene	E	Elsevier	2002	American Journal of Surgery
Eugene	E	Elsevier	2002	Ophthalmology: Journal of the American Academy of Ophthalmology
Eugene	E	Elsevier	2002	Urology
Eugene	E	Elsevier	2003	American Journal of Ophthalmology
Evangelista	A	ACS	2002	Analytical Chemistry
Evangelista	A	ACS	2002	Biotechnology Progress
Evangelista	A	ACS	2002	Chemical Reviews
Evangelista	A	ACS	2002	Chemistry of Materials
Evangelista	A	ACS	2002	Energy & Fuels
Evangelista	A	ACS	2002	Journal of the American Chemical Society
Evensen	D	ACS	2001	Journal of the American Chemical Society
Evensen	D	ACS	2002	Inorganic Chemistry
Evensen	D	ACS	2002	Journal of Organic Chemistry
Evensen	D	ACS	2002	Journal of Physical Chemistry
Evensen	D	ACS	2002	Journal of the American Chemical Society
Eversley	G	ACS	2001	ES&T
Eversley	G	ACS	2002	ES&T
Fallow	R	ACS	2002	Analytical Chemistry
Fallow	R	ACS	2002	Energy & Fuels
Faraham	I	ACS	2001	Analytical Chemistry
Fedoroff	R	Elsevier	2002	Urology
Framingham	B	ACS	2001	Analytical Chemistry
Ganz	Edward	ACS	2001	Accounts of Chemical Research
Ganz	Edward	ACS	2001	Analytical Chemistry
Ganz	Edward	ACS	2001	Chemical Reviews
Ganz	Edward	ACS	2001	ES&T

Ganz	Edward	ACS	2001	Journal of Agri and Food Chemistry
Ganz	Edward	ACS	2001	Journal of Organic Chemistry
Ganz	Edward	ACS	2001	Journal of Physical Chemistry
Ganz	Edward	ACS	2001	Journal of the American Chemical Society
Ganz	Edward	ACS	2002	Accounts of Chemical Research
Ganz	Edward	ACS	2002	Analytical Chemistry
Ganz	Edward	ACS	2002	Chemical Reviews
Ganz	Edward	ACS	2002	ES&T
Ganz	Edward	ACS	2002	Journal of Agri and Food Chemistry
Ganz	Edward	ACS	2002	Journal of Organic Chemistry
Ganz	Edward	ACS	2002	Journal of Physical Chemistry
Ganz	Edward	ACS	2002	Journal of the American Chemical Society
Ganz	Edward	Elsevier	2002	Operative Techniques in Otolaryngology Head and Neck Surgery
Ganz	Edward	Elsevier	2004	Journal of the American College of Surgeons
Ganz	Edward	Elsevier	2004	Journal of Vascular Surgery
Ganz	Edward	Elsevier	2004	Surgery
Ganz	Edward	Elsevier	2005	American Heart Journal
Ganz	Edward	Elsevier	2005	Journal of the American Academy of Dermatology
Ganz	Edward	Elsevier	2005	Journal of Thoracic and Cardiovascular Surgery
Ganz	Edward	Elsevier	2005	Seminars in Oncology
Ganz	Edward	Elsevier	2005	Surgical Clinics of North America
Ganz	Edward	Informa	2006	Journal of Broadcasting & Electronic Media
Ganz	Mr	Elsevier	2006	Journal of Pediatrics
Ganz	Mr	Elsevier	2006	Otolaryngologic Clinics of North America
Ganz	Mr	Elsevier	2006	Pediatric Clinics of North America
Goldstein	Elena	Informa	2005	Journal of Economic Methodology
Goldstein	Elena	Wiley	2005	The Economic Journal
Goldstein	Elena	Wiley	2006	The Economic Journal
Goldstein	Elena	Elsevier	2006	Water Research
Goldstein	Elena	Wiley	2007	The Economic Journal
Goldstein	Elena	Wiley	2007	The Modern Law Review
Goldstein	Elena	Wiley	2007	The Rand Journal of Economics
Goldstein	Elena	Wiley	2007	The World Economy
Goldstein	Elena	Wiley	2008	Journal of Finance
Goldstein	Elena	Wiley	2008	The Modern Law Review
Goldstein	Elena	Wiley	2008	The World Economy
Goldstein	Elena	Elsevier	2008	Journal of Banking & Finance
Goldstein	Elena	Elsevier	2008	Journal of Development Economics
Goldstein	Elena	Elsevier	2008	Journal of Financial Economics

Goldstein	Lena	Informa	2008	Cambridge Review of International Affairs
Goldstein	Lena	Informa	2008	Global Society
Goldstein	Lena	Informa	2008	Journal of Human Development
Goldstein	Lena	Informa	2008	Strategic Analysis
Goldstein	MS	Elsevier	2008	Journal Of Banking & Finance
Goldstein	MS	Elsevier	2008	Journal Of Development Economics
Goldstein	MS	Elsevier	2008	Journal Of Financial Economics
Goldsteyn	Alexandr	Informa	2009	Intelligence & National Security
Goldsteyn	Alexandr	Informa	2009	International Journal of Bilingual Education and Bilingualism
Goldsteyn	Alexandr	Informa	2009	International Journal of Intelligence & Counterintelligence
Goldsteyn	Alexandr	Wiley	2008	The Modern Law Review
Goldsteyn	M	Elsevier	2008	Archives De Pediatrie
Goozner	Randi	Wiley	2001	International Journal of Quantum Chemistry
Goozner	Randi	Wiley	2002	International Journal of Chemical Kinetics
Goozner	Randi	Wiley	2002	International Journal of Quantum Chemistry
Goozner	Randi	Elsevier	2002	Journal of Mathematical Analysis and Applications
Goozner	Randi	Wiley	2003	International Journal of Chemical Kinetics
Goozner	Randi	Wiley	2003	Journal of Computational Chemistry
Goozner	Randi	Wiley	2004	International Journal of Intelligent Systems
Goozner	Sally	Wiley	1998	Cancer
Goozner	Sally	Wiley	1999	American Journal of Medical Genetics
Goozner	Sally	Wiley	1999	Cancer
Goozner	Sally	Wiley	1999	Developmental Dynamics
Goozner	Sally	Wiley	1999	Journal of Cellular Biochemistry
Goozner	Sally	Wiley	1999	Journal of Medical Virology
Goozner	Sally	Wiley	2000	American Journal of Medical Genetics
Goozner	Sally	Wiley	2000	Journal of Cellular Biochemistry
Goozner	Sally	Wiley	2000	The Prostate
Goozner	Sally	Wiley	2001	American Journal of Medical Genetics
Goozner	Sally	Wiley	2001	Biotechnology & Bioengineering
Goozner	Sally	Wiley	2001	Chirality
Goozner	SALLY	ACS	2001	Journal of Physical Chemistry
Goozner	Sally	Wiley	2001	The Prostate
Goozner	Sally	Elsevier	2002	Cell
Goozner	Sally	Wiley	2002	Chirality
Goozner	Sally	Elsevier	2002	Enzyme and Microbial Technology
Goozner	Sally	Elsevier	2002	Journal of Algebra

Goozner	Sally	Elsevier	2002	Journal of Differential Equations
Goozner	Sally	Elsevier	2002	Journal of Functional Analysis
Goozner	Sally	Elsevier	2002	Neuron
Goozner	Sally	Wiley	2002	The Prostate
Goozner	Sally	Elsevier	2003	Cell
Goozner	Sally	Wiley	2003	Chirality
Goozner	Sally	Elsevier	2003	Journal of Differential Equations
Goozner	Sally	Elsevier	2003	Journal of Functional Analysis
Goozner	Sally	Wiley	2003	Molecular Reproduction & Development
Goozner	Sally	Wiley	2003	The Prostate
Goozner	Sally	Elsevier	2004	Cell
Goozner	Sally	Wiley	2004	Chirality
Goozner	Sally	Elsevier	2004	Journal of Differential Equations
Goozner	Sally	Elsevier	2004	Journal of Functional Analysis
Goozner	Sally	Wiley	2004	The Prostate
Goozner	Sally	Elsevier	2005	Cell
Goozner	Sally	Wiley	2005	Chirality
Goozner	Sally	Elsevier	2005	Immunity
Goozner	Sally	Elsevier	2005	Journal of Differential Equations
Goozner	Sally	Elsevier	2005	Journal of Mathematical Analysis and Applications
Goozner	Sally	Elsevier	2006	Journal of Differential Equations
Goozner	Sally	Elsevier	2006	Journal of Mathematical Analysis and Applications
Goozner	Sally	Elsevier	2006	Neuron
Gross	Herbert	Elsevier	2002	International Review of Law and Economics
Habib	N	ACS	2001	Analytical Chemistry
Habib	N	ACS	2001	Biochemistry
Hayat	Jeffrey	Elsevier	2002	Journal of Computational Physics
Hayat	Jeffrey	Elsevier	2002	Journal of Solid State Chemistry
Hayat	Sarah	Wiley	1999	American Journal of Hematology
Hayat	Sarah	Wiley	1999	Journal of Robotic Systems
Hayat	Sarah	Wiley	1999	Journal of Surgical Oncology
Hayat	Sarah	Wiley	2000	Journal of Robotic Systems
Hayat	Sarah	Wiley	2000	Journal of Surgical Oncology
Hayat	Sarah	Elsevier	2001	Biological Psychiatry
Hayat	Sarah	Wiley	2001	Journal of Surgical Oncology
Hayat	Sarah	Elsevier	2002	Cell
Hayat	Sarah	Wiley	2002	Journal of Surgical Oncology
Hayat	Sarah	Elsevier	2003	Cell
Hayat	Sarah	Elsevier	2003	Journal of Clinical Epidemiology
Hayat	Sarah	Wiley	2003	Journal of Surgical Oncology
Hayat	Sarah	Wiley	2003	Neurourology and Urodynamics
Hayat	Sarah	Elsevier	2004	Cell
Hayat	Sarah	Wiley	2004	Journal of Surgical Oncology
Hayat	Sarah	Wiley	2004	Neurourology and Urodynamics
Hayat	Sarah	Elsevier	2005	Cell

Hayat	Sarah	Elsevier	2005	Journal of Clinical Epidemiology
Hayat	Sarah	Wiley	2005	Journal of Surgical Oncology
Hayat	Sarah	Wiley	2005	Pediatric Blood & Cancer
Hittelman	Robert	Informa	2005	Immunopharmacology and Immunotoxicology
Hittelman	Robert	Informa	2005	Renal Failure
Jackson	Roger	ACS	2001	Accounts of Chemical Research
Jackson	Roger	ACS	2001	Analytical Chemistry
Jackson	Roger	ACS	2001	Chemical Reviews
Jackson	Roger	ACS	2001	I&EC Research
Jackson	Roger	ACS	2001	Inorganic Chemistry
Jackson	Roger	ACS	2001	Journal of Natural Products
Jackson	Roger	Elsevier	2002	American Journal of Surgery
Jackson	Roger	ACS	2002	ES&T
Jackson	Roger	ACS	2002	Journal of the American Chemical Society
Jackson	Roger	Elsevier	2003	American Journal of Surgery
Jacobs	Arnold	ACS	2002	I&EC Research
Jacobs	Arnold	ACS	2002	Journal of Physical Chemistry
Jader	Alan	ACS	2001	Journal of Natural Products
Jader	Alan	ACS	2001	Journal of Organic Chemistry
Jader	Alan	ACS	2001	Journal of Physical Chemistry
Jader	Alan	ACS	2001	Journal of the American Chemical Society
Jader	Alan	Elsevier	2002	American Journal of Cardiology
Jader	Alan	Elsevier	2002	American Journal of Medicine
Jader	Alan	Elsevier	2002	American Journal of Ophthalmology
Jader	Alan	Elsevier	2002	American Journal of Surgery
Jader	Alan	ACS	2002	I&EC Research
Jader	Alan	ACS	2002	Inorganic Chemistry
Jader	Alan	ACS	2002	Journal of Natural Products
Jader	Alan	ACS	2002	Journal of Organic Chemistry
Jader	Alan	ACS	2002	Journal of Physical Chemistry
Jader	Alan	ACS	2002	Journal of the American Chemical Society
Jader	Alan	Elsevier	2002	Journal of the American College of Surgeons
Jader	Alan	Elsevier	2002	Ophthalmology: Journal of the American Academy of Ophthalmology
Johnson	Nathan	ACS	2001	Accounts of Chemical Research
Johnson	Nathan	ACS	2001	Analytical Chemistry
Johnson	Nathan	ACS	2001	Chemical Reviews
Johnson	Nathan	ACS	2001	Inorganic Chemistry
Johnson	Nathan	ACS	2001	Journal of Organic Chemistry
Johnson	Nathan	ACS	2001	Journal of Physical Chemistry
Johnson	Nathan	ACS	2001	Journal of the American Chemical Society
Jones	Thomas	ACS	2001	Journal of Physical Chemistry
Kendall	J	Wiley	2007	Performance Improvement Quarterly

Labattaglia	A	ACS	2001	I&EC Research
Labattaglia	A	ACS	2001	Journal of Medicinal Chemistry
Labattaglia	A	ACS	2001	Journal of Natural Products
Labattaglia	A	ACS	2002	I&EC Research
Labattaglia	A	ACS	2002	Journal of Medicinal Chemistry
Labattaglia	A	ACS	2002	Journal of Natural Products
Labattaglia	A	ACS		ES&T
Lalor	A	Informa	2006	Basic and Applied Social Psychology
Lalor	A	Informa	2006	Human Performance
Lalvin	D	ACS	2002	ES&T
Lalvin	D	ACS	2002	Journal of Natural Products
Lambelli	T	ACS		Analytical Chemistry
Lammat	A	Elsevier	2002	American Journal of Ophthalmology
Larm	C	Elsevier	2002	American Journal of Surgery
Larmdale	B	Elsevier	2002	American Journal of Surgery
Lashdan	P	Elsevier	2002	American Journal of Surgery
Lashdan	P	Elsevier	2002	Journal of Cataract & Refractive Surgery
Lasteen	T	Elsevier	2002	American Journal of Medicine
Learnon	A	Elsevier	2002	American Journal of Medicine
Learnon	A	Elsevier	2002	American Journal of Surgery
Learnon	A	Elsevier	2002	Journal of the American College of Surgeons
Lee	T	ACS	2001	I&EC Research
Lee	T	ACS	2001	Inorganic Chemistry
Lee	T	ACS	2001	Journal of Medicinal Chemistry
Lee	T	ACS	2001	Journal of Natural Products
Lee	T	ACS	2002	Journal of Medicinal Chemistry
Lee	T	ACS	2002	Journal of Natural Products
Lelt	T	ACS	2002	Journal of Agri and Food Chemistry
Lemann	F	Elsevier	2003	Clinical Gastroenterology and Hepatology
Lemann	F	Elsevier	2004	Clinical Gastroenterology and Hepatology
Lennar	R	ACS	2002	ES&T
Lennar	R	ACS	2002	Journal of Agri and Food Chemistry
Lento	F	Informa	2006	Journal of Applied Animal Welfare Science
Lesenberg	G	Informa	2006	Research on Language & Social Interaction
Letterman	B	ACS	2002	Journal of the American Chemical Society
Liddison	N	Elsevier	2002	American Journal of Ophthalmology
Likapa	S	Elsevier	2002	Journal of Macroeconomics
Lisette	E	Elsevier	2002	Journal of the American College of Surgeons
Livander	D	Elsevier	2005	Journal of Cardiothoracic and Vascular Anesthesia

Livander	D	Elsevier	2005	Regional Anesthesia and Pain Medicine
Lobel	S	ACS	2002	Journal of Natural Products
Lodund	D	Elsevier	2002	American Journal of Ophthalmology
Lodund	D	Elsevier	2002	American Journal of Surgery
Lodund	D	Elsevier	2002	Urology
Loozner	R	Elsevier	2002	American Journal of Cardiology
Loozner	R	Elsevier	2002	American Journal of Medicine
Lorps	F	Informa	2006	Basic and Applied Social Psychology
Lorps	F	Informa	2006	Journal of the Learning Sciences
Lorps	F	Informa	2006	Multivariate Behavioral Research
Lorps	F	Informa	2006	Structural Equation Modeling: A Multidisciplinary Journal
Luxton	P	Elsevier	2002	American Journal of Cardiology
Nishco	J.	Wiley	1999	Cancer
Noyes	Ellen	ACS	2001	Journal of Agri and Food Chemistry
Noyes	Ellen	ACS	2002	Journal of Agri and Food Chemistry
Perrine	Donald	Informa	2004	Communications in Algebra
Perrine	Donald	Informa	2005	Journal of Mathematical Sociology
Perrine	Donald	Informa	2005	The European Journal of Finance
Perrine	Donald	Wiley	2004	Strategic Management Journal
Perrine	William	Wiley	2004	Journal of Clinical Ultrasound
Perrine	William	Wiley	2004	Muscle and Nerve
Perrine	William	Wiley	2004	Research in Nursing & Health
Perrine	William	Wiley	2004	Zoo Biology
Perrine	William	Wiley	2005	Journal of Clinical Ultrasound
Perrine	William	Wiley	2005	Muscle and Nerve
Perrine	William	Wiley	2005	Research in Nursing & Health
Pessina	Barbara	Elsevier	2008	Cell
Pessina	Barbara	Elsevier	2009	Biophysical Journal
Randi	Susan	Informa	2007	Journal of Public Relations Research
Randi	Susan	Informa	2007	Multivariate Behavioral Research
Rooney	Greg	Informa	2005	International Journal of Food Properties
Rooney	Greg	Informa	2005	Review: Literature & Arts of the Americas
Rooney	Greg	Informa	2006	International Journal of Food Properties
Rooney	Greg	Informa	2007	International Journal of Food Properties
Sherman	Inna	Wiley	2008	Architectural Design
Sherman	Inna	Informa	2008	Discourse Processes
Sherman	Inna	Elsevier	2008	Journal of Comparative Economics
Sherman	Inna	Elsevier	2009	Journal Of Comparative Economics
Sherman	Leonid	Elsevier	2008	Intelligence
Sherman	Leonid	Elsevier	2008	International Journal Of Intercultural Relations
Sherman	Leonid	Elsevier	2008	Language Sciences

Sherman	Leonid	Elsevier	2008	System
Sherman	Leonid	Elsevier	2008	Intelligence
Sherman	Leonid	Elsevier	2008	Journal of Experimental Social Psychology
Sherman	Leonid	Elsevier	2008	International Journal of Intercultural Relations
Sherman	Leonid	Elsevier	2008	Journal of Phonetics
Sherman	Leonid	Elsevier	2008	Language Sciences
Sherman	Leonid	Elsevier	2008	System
Sherman	Leonid	Wiley	2008	Language Learning
Sherman	Leonid	Wiley	2008	Modern Language Journal
Shvartz	Eugenia	Wiley	2007	International Economic Review
Shvartz	Eugenia	Wiley	2007	The Economic Journal
Shvartz	Eugenia	Wiley	2008	International Economic Review
Shvartz	Eugenia	Wiley	2008	The Economic Journal
Shvartz	Eugenia	Wiley	2007	International Economic Review
Shvartz	Eugenia	Wiley	2007	The Economic Journal
Shvartz	Eugenia	Wiley	2008	International Economic Review
Shvartz	Eugenia	Wiley	2008	The Economic Journal
Sweeney	Edna	Wiley	2004	Biometrical Journal
Tamarkin	H	ACS	2001	Biochemistry
Tamarkin	H	Elsevier	2007	Journal of Pediatrics
Tamarkin	H	Elsevier	2008	Journal of Pediatrics
Tamborelli	R	ACS	2002	Accounts of Chemical Research
Tamborelli	R	ACS	2002	Analytical Chemistry
Tamborelli	R	ACS	2002	Biochemistry
Tamborelli	R	ACS	2002	Chemical Research in Toxicology
Tamborelli	R	ACS	2002	Chemical Reviews
Tamborelli	R	ACS	2002	Chemistry of Materials
Tamborelli	R	ACS	2002	Inorganic Chemistry
Tamborelli	R	ACS	2002	Journal of Agri and Food Chemistry
Tamborelli	R	ACS	2002	Journal of Medicinal Chemistry
Tamborelli	R	ACS	2002	Journal of Organic Chemistry
Tamborelli	R	ACS	2002	Journal of Physical Chemistry
Tamborelli	R	ACS	2002	Macromolecules
Tankell	S	ACS	2001	Journal of Natural Products
Tankell	S	ACS	2002	Journal of Natural Products
Tate	F	ACS	2001	Accounts of Chemical Research
Truitt	P	ACS	2001	Journal of Agri and Food Chemistry
Truitt	P	ACS	2002	Journal of Agri and Food Chemistry
Tyrrell	G	ACS	2001	I&EC Research
Tyrrell	G	ACS	2001	Journal of Chem and Eng Data
Tyrrell	G	ACS	2002	I&EC Research
Tyrrell	G	ACS	2002	Journal of Chem and Eng Data
Vagodny	Seva	Elsevier	2008	Contemporary Educational Psychology
Waxenakis	P	Informa	2007	Information Systems Security
Wolfs	P	Informa	2007	Journal of Organizational Computing and Electronic Commerce
Worrell	M	Informa	2007	Journal of Community Health Nursing